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Company*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRYAN HUMAN, an individual,

Plaintiff,

vs.

GEICO ADVANTAGE INSURANCE
COMPANY, Inc.; DOES I-X; and ROE
CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:21-cv-00166-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO SUBMIT
PRETRIAL ORDER (Fifth Request)**

Pursuant to LR IA 6-1 and LR 26-3 and FRCP 26, the parties, by and through their respective counsel, respectfully submit this stipulation for extension of time to submit the Pre-Trial Order by a period of thirty (30) days. Counsel for the parties have conferred regarding this matter and agree that such an extension is appropriate and necessary for litigation efficiency. **The parties herein request an extension of the deadline to submit the Pre-Trial Order by an additional thirty (30) days. The parties do not seek the extension or continuance of any other dates.**

1 **1. Discovery Completed to Date**

2 Discovery is now closed. The parties exchanged initial and supplemental disclosures. The
3 parties propounded written discovery in the form of interrogatories, admissions, and requests for
4 production of documents. The parties engaged in deposition discovery and exchanged initial and
5 rebuttal expert disclosures.
6

7 **2. Discovery That Remains to be Completed**

8 None.

9 **3. Reasons Why Counsel Requests the Extension to Submit the Pre-Trial Order**

10 Since participating in non-binding Mediation on August 30, 2022 and requesting the
11 extension to submit the Joint Pretrial Order, the parties worked together to create a draft of the
12 Joint Pretrial Order. However, they require additional time to meet and confer and to finalize the
13 document. The parties already met telephonically one time and have another phone conference
14 scheduled on October 11, 2022. The parties believe that the additional thirty (30) day extension
15 of the deadline for the Pretrial Order is necessary and appropriate based upon the foregoing. The
16 parties also believe good cause is demonstrated by the recited facts and in support of the
17 extension of the instant deadline.
18
19

20 **4. Proposed Schedule for Completion of Outstanding Discovery**

21 The parties respectfully propose the following deadlines:
22

<u>Event</u>	<u>Current Deadline</u>	<u>New Deadline</u>
Last day to add parties or amend pleadings	--	Closed
Initial Expert Disclosures	--	Closed
Rebuttal Expert Disclosures	--	Closed
Close of Discovery	--	Closed

Dispositive Motions Deadline	--	Closed
Pretrial Order	October 3, 2022	November 2, 2022

DATED this 3rd day of October 2022.

STOVALL & ASSOCIATES

/s/Ross Moynihan

ROSS MOYNIHAN
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Attorney for Plaintiff

DATED this 3rd day of October 2022.

WINNER & BOOZE

/s/Lara L. Miller

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Attorney for Defendant

ORDER

IT IS SO ORDERED this 4th day of October, 2022.


UNITED STATES MAGISTRATE JUDGE